

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:20 CR 83 SRC JMB
)	
MOSE JONES,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

The United States of America by and through its attorneys Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and James Redd, Assistant United States Attorney for said District, respectfully moves the Court to order that Defendant be detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to 18 U.S.C. §3141, et seq. As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of being a felon in possession of a firearm in violation of 18 U.S.C. §922(g)(1).

2. On January 26, 2020, according to St. Louis Metropolitan Police Department complaint number 20-4309, Officers initiated a traffic stop of a passenger vehicle for a license plate violation. As Officers approached the stopped vehicle, Defendant attempted to exit and was asked to remain in the vehicle. Defendant repeatedly reached into his coat during the stop, and refused to comply with Officers' request that he keep his hands out his coat. Defendant was ultimately detained, and, while being detained, reached into his coat and threw a Taurus 9mm firearm onto the passenger seat of the vehicle. A computer inquiry revealed Defendant was a convicted felon, and had outstanding warrants for possession of a controlled substance and motor vehicle tampering in the

first degree.

3. Defendant is a convicted felon. Defendant's felony convictions include possession of a controlled substance (multiple) and motor vehicle tampering in the first degree. In addition to his felony convictions, Defendant has multiple violent arrests, including for domestic assault in the second degree, domestic assault in the third degree, assault in the third degree (multiple), and assault/attempted assault on a law enforcement officer.

4. Pursuant to 18 U.S.C. §3142(g), the weight of the evidence against Defendant, the Defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by Defendant's release warrant Defendant's detention pending trial.

5. There is also a serious risk that Defendant will flee. Defendant faces a serious charge in this action, and the investigation is ongoing. Defendant's criminal history indicates he has had a period of supervision revoked due to engaging in criminal conduct while on supervision. Further, Defendant's incarceration records show he has escaped from the transition center of St. Louis on at least two occasions.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ James Redd
JAMES REDD, #66172(MO)
Assistant United States Attorney